

Your Trainers

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Learning Objectives

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- NDE will summarize the purpose of the review & steps to ensure compliance
- School will understand how to operate software to submit review information
- School will understand how to utilize self-review checklist to prepare for review

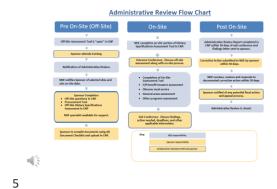
Administrative Review Resources

- PowerPoint presentation
- SFA Tools
 - · Administrative Review Flow Chart
 - Off-Site Assessment Guide
 - · Self Review Checklist
 - Document Checklist

<u>Administrative Review – Nebraska Department of</u>



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Accessing the Off-site AR forms in CNP



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Accessing the Off-site AR forms in CNP

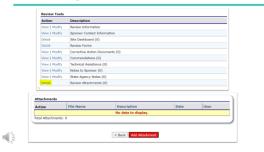


Document Checklist



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Uploading Documents in CNP



Review Process By Program Area

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- Agenda

 Certification & Benefit Issuance, Meal Counting & Claiming
- Meal Pattern Compliance & Dietary Specifications
- General Program Requirements



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Certification & Benefit Issuance and



Certification & Benefit Issuance and Verification

- Meal application and supporting materials are available on the <u>Application - Income Eligibility</u> webpage
- Provide NDE with documentation of each student's meal benefit
 - Roster of students with Free or Reduced-price meal benefits
 - · Direct certification match list for administrative review year
 - · Meal applications for administrative review year



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Meal Counting & Claiming

- Reimbursable meals must meet the NSLP/SBP meal pattern
- Point of service meal counting must ensure a reliable meal count total of Free, Reduced-price and Paid-price meals
 - Use a paper roster or electronic point of service system to record meals by meal type each serving day



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Meal Counting & Claiming



Meal Counting & Claiming

What to do if inaccurate meal counts for the day of review or review month?

- SFA can report incorrect meal counts to SA; complete revision to submitted claim
- State agency watches meal service to ensure meal counter identifies reimbursable meals correctly, to ensure meal counting is accurate
 - DO NOT COUNT meals served to adults, a la carte items, second meals or second helpings



Review Process

- Answer #100, #200, and #300 level Off-site questions Ensure claim for review month is submitted in CNP
- Provide daily/monthly meal counts for the review month for sites that will be
- reviewed Provide meal counts for day of on-site review for sites that were visited/reviewed

- Review Off-site questions before site visits/review
- Review edit checks
- Reconcile claim for the review month
 - o Meal counts
 - Meal benefit



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Meal Pattern

- All meals claimed for reimbursement must meet the NSLP/SBP meal pattern
 - Components, serving sizes & dietary specifications
- USDA recognized the potential challenges with meeting NSLP/SBP meal pattern because of supply chain issues
 - Experiencing challenges: contact NDE Nutrition Services



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Dietary Specifications Risk Assessment

Completed off-site by sponsor

 Verified by reviewer based on submitted documentation



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Menu Assessments

- Dietary Specifications (600 series)
 - School completes off-site choose Option 1



Menu Assessments

- Dietary Specifications (600 series)
 - Complete BLUE Dietary Specifications Risk Assessment



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Menu Assessments

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• Complete BLUE Dietary Specifications Risk



Menu Review

- · Reviewer will notify the school of selected menu week
- School provide:
 - Production records
 - · Meal pattern contribution
 - Standardized recipes Product documentation

Review training for guidance on completing production records: School Meals Training - Nebraska Department of Education



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Submit documentation for selected menu items: • Meat/Meat Alternates • Child Nutrition (CN) label • Signed product formulation statement • USDA product information statement • USDA product information statement • USDA product information statement • A Nutrition Facts Panel with the grams or ounces per serving AND an ingredient list

All Other Menu Items

 Documentation needed for <u>all</u> menu items for the week of review include:

- Production records,
- recipes, or
 separate document
- separate documen
- Whole grain-rich documentation



Cornbread (School Recipe)

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Do not submit labels for fruits, vegetables, condiments of spices!

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Fiscal Action: Meal Pattern & Dietary

- Missing meal components or production records
- Milk type and vegetable subgroup findings (repeat violations)

Specifications

 Non-reimbursable meals counted and claimed at the point of sale



Review Process

Sponsor

- Answer off-site question Dietary Specifications (600 Series)
- Provide menu and daily production records for the week of review for all review sites (if menus are different)
- Provide product documentation for requested items

Reviewer

- Staff will review all supporting meal documentation submitted
- Verification of answers in Dietary Specification Assessment Tool

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Agenda General Program Requirements

General Program Compliance



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General Program Review Questions in CNP



Civil Rights - Overview of Requirements

- · Must include current non-discrimination statement on program materials
 • Exception: Title IX waiver for religious schools
- Must have a complaint procedure in place that meets the minimum requirements
- · Conduct and document annual staff civil rights training
- · Have the And Justice for All Poster posted at all sites (2019 version OK)
- · Visit our Civil Rights Information for more for training links and materials

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Special Diets - Overview of Requirements

- Accommodate special dietary needs when supported with Medical Statement
 - Needs due to disabilities do not need to meet meal pattern requirements
- · Schools can choose to make accommodations for dietary
 - Accommodations for preferences must meet all meal pattern requirements
 - Household completes Meal Accommodation Form
- Visit our Special Diets webpage for forms, templates, and resources

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- **Sponsor** • Answer #800 off-site questions Questions include providing the following documentation:
- Non-discrimination statement
 Annual Civil Rights training documentation

Review Process

- Civil Rights complaint procedure
- Accommodating special dietary needs procedure

• Review off-site questions and supporting documents

View | Modify 800 - Civil Rights

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Food Safety Requirements

- Your local public health department is the ultimate authority on food safety related questions
- A food safety plan/HACCP plan for providing meals to students in the school district
- For state-level guidance, please consult Ericka Sanders 402-471-3422; ericka.sanders@nebraska.gov
- · View our food safety webpage for more resources

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Buy American Provision -Overview of Requirements

- School Food Authorities must ensure that all procurements using funds from the nonprofit school food service account comply with the Buy American provisions. This provision requires SFAs to purchase domestically grown and processed foods, to the maximum extent practicable. This includes foods that are sold to students as a la carte food items.
- Visit our **Buy American** webpage for the Buy American exemption form, and resources

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Review Process

Sponso

- Food safety/HACCP plan readily available & followed at all meal service sites
- Post most recent health inspection in a visible location
- Ensure Standard Operating Procedures are current
- Ensure products meet Buy American Provision

Reviewer

- Review dates of most recent health inspections
- Review temperature/thermome ter calibration logs
- Review Standard
 Operating Procedures

Local school wellness Policy Iriennial Assessment

- Sponsors should continue to implement the goals and standards included in their local school wellness policy (LSWP) and comply with all requirements of the final rule.
 - Please ensure that your triennial assessment has been completed and that the results, along with the LSWP, are publicly available (e.g., on district, school, or residential childcare institution (RCCI) website).
 - An overview of the triennial assessment requirements and a helpful self-review checklist may be accessed HERE.
- View our <u>School Wellness Policy</u> webpage for more resources; or contact Lauren Christensen at <u>lauren.christensen@nebraska.gov</u> for additional support.



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Review Process

Sponsor

- Answer #1000 off-site questions
 Questions include provide
- Questions include providing the following documents:
 Local School Wellness Policy
- Public notification of policy
- Documentation of the review and update of the wellness
 - policy
 Assessment on the implementation of the policy

Reviewer

Review off-site questionsReview supporting



Smart Snacks & Competitive Foods

- Competitive food sales for students must meet Smart Snacks regulations when sold on campus during the school day
- Sponsor must submit product documentation to include:
 - O Child Nutrition (CN labels)
 - Standardized recipes
 - O Signed product formulation statement, or
 - O Nutrition Facts Panel





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View | Modify 1000 - Local School Wellness Policy

Water Requirements

- Ensure free water is available during meal service
- Water in the cafeteria does not have to be bottled; it can be a water fountain in or adjacent to the cafeteria, or water cooler with cups



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Review Process

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On-Site Monitoring

- Each meal site must be reviewed at least once during the year and must be completed by February 1
- Utilize the On-Site Review Summary (Attachment I)
- Sponsors with more than one school must re:
 - All sites operating lunch
 - 50% of sites operating breakfast



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Review Process

Sponsor • Answer #900 off-site questions • Conduct monitoring visits by February 1st • Provide site monitoring forms for reviewed sites | View | Modity | 900 - SFA On Site Monitoring |

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Reporting and Record Retention

1 Year (plus current year)

 • HACCP records

 • All program records (production records, monitoring forms, meal counts, etc.)
 • Certification documents
 • Verification documents

Review Process

Sponsor

- Retain program records
- Provide a sample of records during on-site review

Reviewer

 Verify that all program records are kept for the required timeframe

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School Breakfast and Summer Outreach

- Schools must inform households of the availability of breakfast under the School Breakfast Program (SBP) and meals offered through the Summer Food Service Program (SFSP).
- Each April, the NDE provides communication templates SFAs can use to promote the SFSP near the end of the school year
 - Proof you provided SFSP into on your school website, in newsletters, other communication channel even if your school does not participate in the SFSP 7CFR 210.12(d)

Review Process

 Answer #1600 off-site questions

- Notify households of the breakfast program, if applicable
- Notify households of the availability of the SFSP across the state, even if not applicable at the district

View | Modify 1600 - School Breakfast and SFSP Outreach

Reviewer

• Review off-site questions

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Professional Standards Requirements

- Refer to professional standards minimum hours handout
- Track each staff members' compliance with annual training requirements
- Civil Rights training and tracking is still required for all staff

Professional Standards – Nebraska Department of Education



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Review Process

Sponsor

- Answer #1200 off-site questions
 Provide:
- List of all employees
 Food safety training for directors/managers
- Training/tracking tool/method
 Supporting documentation for

Completed trainings
| View | Modify | 1200 - Professional Standards

Reviewer

 Review off-site questions and supporting documentation

accumentation

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Resource Management

- Maintenance of nonprofit food service account
 - Ensure proper coding
 - Have internal control procedures in place
- Nonprogram Revenue
 - Must track income from second helpings/servings, a la cart, and adult meals
 - A la carte and adult meal prices must cover all costs (general fund cover deficit)
 - Must separate program and nonprogram revenue soul

Review Process

Sponsor

- Complete Resource
 Management Off-site
 forms
 Provide additional
- Provide additional information & documentation as needed

Reviewe

- Complete risk indicator tool and determine areas requiring a comprehensive review
- Request additional documentation to complete comprehensive review, if applicable

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Procurement

All sponsors must have documentation to show how USDA funds are used

- Micropurchase <\$10,000 annually per vendor
 - "Spread the wealth" to all qualified vendors
- Small purchase >\$10,000 & <\$250,000 annually per vendor
 - 3 or more bids where price probably determines purchase
 - Other factors might influence
- Formal procurement >\$250,000 annually per vendor
 - Solicit proposals where many factors are considered, price being most valued

Review Process

Sponsor

- Complete Procurement Off-Site Questions (excel document)
- Submit a Vendor Paid List (VPL) for \$Y23-24, Code of Conduct and Procurement Policies
- Submit invoices, other documentation identified in Off-site questions

Reviewe

- Review invoices and solicitation documentation and complete procurement review
- Provide technical assistance as needed

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FFVP

- FFVP in SY2024-2025:
 - Must operate during the school day
 - CANNOT be provided at the same time as other Child Nutrition Programs/meals
- Keep FFVP items' receipts/invoices
- Track time for staff working in breakfast/lunch and FFVP
- FFVP time included in FFVP claim must be recorded



Review Process

Sponsor

 "Other Federal Programs" off-site form

Reviewer

- Review program costs documentation (i.e. invoices, time sheets)
- Review production records
- Observe FFVP service

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Afterschool Snack Program

- ASP must follow meal pattern requirements & must be documented
- Like NSLP/SBP, maintain a daily meal count based on participant meal eligibility
 - Except for area eligible sites
- Reconcile monthly claim and check for accuracy



Review Process

- "Other Federal Programs" off-site form
- Production records for the
- review month

 Daily snack counts and program rosters for the review month
- · Afterschool Snack Program review forms

- Validate snack counts claimed for review period and day of review
 ASP review form completed within first 4 weeks of service

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Post Review



Major Takeaway

How to make this process easier on yourself? Forms completed in advance of on-site visit



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(2) Fax: (202) 690-7442; or

(3) Email: program.intake@usda.gov.

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